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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

APR 17 2003

at 11 o'clock and 45 min. 7 M
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. CRO3 00189 SOM
)	
Plaintiff,)	INDICTMENT
)	
vs.)	[21 U.S.C. §§ 846 and 841]
)	
ROBERT CULLEN, (01))	
REESE KEONI HAIOLA, (02))	
)	
Defendants.)	
_____)	

INDICTMENT

Count 1

The grand jury charges that:

From a date unknown, but from sometime in March, 2003, to April 9, 2003, in the District of Hawaii, and elsewhere, the defendants, ROBERT CULLEN and REESE KEONI HAIOLA, did conspire together and with each other and other persons known and unknown

to the Grand Jury, to knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of 21 U.S.C. Sections 841(a)(1) and (b)(1)(B).

OVERT ACTS

In furtherance of and in order to accomplish the objects of this conspiracy, the defendants and their co-conspirators performed overt acts in the District of Hawaii, and elsewhere, including but not limited to, the following:

1. In or around March, 2003, defendant REESE KEONI HAIOLA travelled to Las Vegas, Nevada, from Honolulu, Hawaii, to purchase approximately two pounds of methamphetamine.

2. Defendant REESE KEONI HAIOLA provided approximately twenty thousand dollars in U.S. currency to an individual in Las Vegas, Nevada to purchase two pounds of methamphetamine.

3. In or around March, 2003, Defendant ROBERT CULLEN contacted another individual to assist in Defendant REESE KEONI HAIOLA's purchase of the two pounds of methamphetamine in Las Vegas, Nevada.

4. On or about April 7, 2003, defendant ROBERT CULLEN directed another individual to send a federal express package containing approximately \$21,000 in U.S. currency from Honolulu, Hawaii, to defendant REESE KEONI HAIOLA in Las Vegas,

Nevada, for the purchase of additional quantities of methamphetamine.

5. On or about April 10, 2003, defendant REESE KEONI HAIOLA contacted federal express in Las Vegas, Nevada to obtain the package containing approximately \$21,000.

All in violation of 21 U.S.C. §846.

Count 2

The grand jury charges that:

As a result of committing the offense alleged in Count 1 of this Indictment, Defendant ROBERT CULLEN shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting, or derived from, any proceeds which Defendant ROBERT CULLEN obtained, directly or indirectly, as the result of such offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense including but not limited to the following:

Approximately Twenty-one Thousand
Dollars (\$21,000) in United States
Currency

If any of the above-described forfeitable property, as a result of any act or omission of the Defendant --

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;

3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of the Defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Sections 853.

Count 3

The grand jury charges that:

On or about April 8, 2003, in the District of Hawaii, the defendant, ROBERT CULLEN, did knowingly and intentionally attempt to possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers and salts of its isomers, to wit, approximately five pounds, a Schedule II controlled substance.

All in violation of 21 U.S.C. § 846.

Count 4

The grand jury charges that:

As a result of committing the offense alleged in Count 3 of this Indictment, Defendant ROBERT CULLEN shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all

property constituting, or derived from, any proceeds which Defendant ROBERT CULLEN obtained, directly or indirectly, as the result of such offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense including but not limited to the following:

Approximately Sixty-five Thousand
Dollars (\$65,000) in United States
Currency;

If any of the above-described forfeitable property, as a result of any act or omission of the Defendant -

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of the Defendant up to the value of the above forfeitable property.

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All in violation of Title 21, United States Code,
Sections 853.

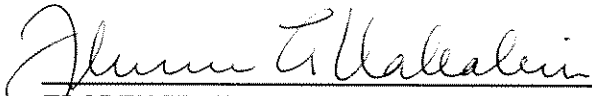
DATED: APR 17, 2003, Honolulu, Hawaii.


A TRUE BILL

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FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.
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United States v. Robert Cullen, et.al.
Cr. No. _____
"Indictment"